

**UNITED STATES DISTRICT COURT  
FOR THE DISTRICT OF MONTANA  
MISSOULA DIVISION**

EUGENE DESHANE MITCHELL,  
SHAYLEEN MEUCHELL, *on their  
own behalf and as next friend of B.M.,*

Plaintiffs,

v.

FIRST CALL BAIL AND SURETY,  
INC.; ALLEGHENY CASUALTY  
COMPANY; INTERNATIONAL  
FIDELITY INSURANCE COMPANY;  
THE MONTANA CIVIL  
ASSISTANCE GROUP; MICHAEL  
RATZBURG; VAN NESS BAKER;  
and JASON HAACK,

Defendants.

Case No. 9:19-cv-00067-DLC

**PARTIES' STATEMENT OF  
STIPULATED FACTS**

1. In January 2017, Eugene Mitchell was incarcerated.
2. In January 2017, Mr. Mitchell and Shayleen Meuchell signed a Bail Bond Agreement (Agreement) with Defendant First Call Bail & Surety, Inc.
3. Ms. Meuchell was an indemnitor on the Agreement.
4. Exhibit A to the Complaint contains a correct copy of the Agreement.
5. First Call Bail and Surety is a Montana corporation with its principal place of business at 400 W. Broadway, Suite 101-412, Missoula, MT 59802.
6. Michael Ratzburg is the owner of First Call.

7. Mr. Ratzburg resides in Missoula County, Montana.
8. International Fidelity Insurance Company is a New Jersey corporation with its principal place of business in New Jersey.
9. Allegheny Casualty Company is a New Jersey corporation with its principal place of business in New Jersey.
10. AIA Holdings is a Delaware corporation with its principal place of business in California.
11. This Court may exercise supplemental jurisdiction, in its discretion, under 28 U.S.C. § 1367.
12. Venue is proper in this Court.
13. In Montana, commercial bail practices are regulated through insurance codes.

Dated: November 14, 2019.

Respectfully submitted

TERRELL MARSHALL  
LAW GROUP, PLLC

CROWLEY FLECK PLLP

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CERTIFICATE OF SERVICE

I, Toby J. Marshall, hereby certify that on November 14, 2019, I electronically filed the foregoing with the Clerk of the Court using the CM/ECF system which will send notification of such filing to the following:

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International Fidelity Insurance Company, First Call Bail and  
Surety, Inc., and Michael Ratzburg*

No appearances have been entered in this case on behalf of  
Defendants Baker, Haack, or MCAG.

Dated: November 14, 2019.

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